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Sent: Thursday, July 07, 2005 10:31 AM
To: National List
Subject: Comments on Docket #TM-04-07

Attachments: scott.sanders3.vcf

As a manufacturer of Organic crackers and cookies and breads, I have the following comments regarding Docket #TM-04-07:

1. Acids: Alginic, Citric and Lactic. I favor allowing organic acids which are produced by natural fermentation (via non-GMO organisms). I am not aware of any adverse health or environmental issues.

Alternatives, such as citrus juice or concentrates, would carry with them distinctive flavors which would detract from certain major product categories.

2. Calcium carbonate: This substance, derived from high carbonate rock deposits, is often used to provide calcium enrichment to bread and cookies. There are no known health or environmental issues that I am aware of. Two main forms are available: Natural and precipitated. The natural form is mined, and then sifted, and sorted to produce the purity and granulation size desired. On the other hand, precipitated calcium carbonate goes through various chemical reactions, and would probably not be appropriate for use in organic food products.

3. Enzymes: Enzymes are used to catalyze, or speed up reactions which otherwise would occur very slowly. Our world is full, and we are full of naturally occurring enzymes. They are a part of our life. Enzymes are being used in breads to replace potentially harmful chemicals such as potassium bromate. They are used in crackers to relax the dough and allow it to be sheeted thinly prior to baking. Without enzymes, production of many types of crackers, particularly organic crackers would not be possible. Known substitutes are likely more harmful (i.e. sulfites). Non-GMO of course would be a requirement for enzymes used in organic production.

3. Flavors (non synthetic): Flavors, such as vanilla extract are of course essential to many cookies. As long as non synthetic carriers are used and the product is non-GMO, I see no issues here, There are no known substitutes to many flavors.

4. Sodium bicarbonate: Baking soda has been used for hundreds of years with no known health or environmental issues. Moreover, it is often used to correct acidic environmental conditions. Baking soda is an essential component for many cookies and crackers. One substitute would be potassium bicarbonate, but that would fit under the same category. Additionally, potassium bicarbonate can be associated with a bitter or metallic flavor in foods.

5. Yeast: Yeast (in it's various forms are of course required for bread and many cracker formulations. Yeast occurs in nature and is also manufactured. Most is grown on molasses. There are no known health or environmental issues associated with yeast that I am aware of.

6. Ammonium bicarbonate: Ammonium bicarbonate is used in some cookie and cracker manufacturing to produce a light texture. It reacts in the oven,

produces puffing of the product, and then flashes off. No ammonium remains in the finished product. Thus, there are no health issues. I know of no known substitute.

7. Calcium phosphates: Calcium phosphates (i.e. monocalcium phosphate) are used in many cookie and cracker leavening systems. This acid reacts with baking soda to produce carbon dioxide. Although any acid, whether naturally occurring or synthetic, can also react with baking soda, the reaction is not controlled and gas may be produced at the wrong time and not be sustained. Thus there are no suitable known substitutes for calcium phosphates. Additionally, I know of no known health or environmental issues.

8. Potassium acid tartrate: Otherwise known as "cream of tartar", this has been a favorite of the natural foods industry as a less "chemical sounding product" versus other leavening acids. In reality, there is potassium acid tartrate is no less "chemical" than the others. I see no reason why both cream of tartar and acid phosphates would not be allowed.

I am quite certain that others will have objections to many of the other substances listed being removed from the list. I have limited my comments to substances of our immediate interest. Removal of these items will certainly result in the disappearance of many current organic breads, cookies, crackers and cake products to the detriment of the organic food consumer.

Sincerely,

Scott W. Sanders
Quality Assurance Manager
Safeway Inc.

"MMS <safeway.com>" made the following annotations.

Warning:

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